

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION II

36942

DATE: May 21, 1986

SUBJECT: National Gypsum - Asbestos Dump QAPP

FROM: Marcus E. Kantz, Chief *M. E. Kantz*
Air Monitoring Section

TO: Lisa Gatton
Monitoring Management Branch

We have reviewed the latest revision of the National Gypsum - Asbestos Dump QAPP by Fred C. Hart and Associates and have noticed little change since the last submittal. We have noticed in John Czapor's cover letter that proper wetting of the affected areas will be employed. However, this action is not reflected in the POP. Proper wetting must be maintained in order to control airborne emissions of asbestos fibers.

Fred C. Hart's proposed asbestos emissions tests involving fiber counts, should not be performed. The only appropriate method for determining whether asbestos fibers are becoming airborne is visual observation. If any dust can be seen with the naked eye, in an area where friable asbestos is present, asbestos fibers are in the air; additional wetting should be employed. This technique is simple, yet if followed carefully, will result in a much safer investigation.

Once the POP is modified to eliminate any reference to air sampling and to include explicit procedures for wetting all exposed material and for using visible observation as a test for sufficient wetting, it will be approvable from our point of view.

If you have any questions, please call Ms. Suzanne Jacquet of my staff at FTS 340-6810.

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MONITORING MANAGEMENT

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